

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.

Antonio Johnson

Case: 2:24-mj-30295  
Case No. Assigned To : Unassigned  
Assign. Date : 7/26/2024  
Description: COMP USA V.  
JOHNSON (KB)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 24, 2024 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(o)

*Offense Description*  
Illegal possession of a machinegun

This criminal complaint is based on these facts:  
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: July 26, 2024

City and state: Detroit, MI



*Complainant's signature*

Jeffrey Jacobs, Special Agent, FBI  
*Printed name and title*



*Judge's signature*

Hon. Anthony P. Patti, U.S. Magistrate Judge  
*Printed name and title*

## **AFFIDAVIT**

I, Jeffrey Jacobs, being duly sworn, depose and state the following:

### **I. INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such. I have been employed as a Special Agent since January 2005 and am currently assigned to the FBI Oakland County Gang and Violent Crime Task Force. I have conducted and participated in numerous criminal investigations including bank robberies, violent crimes, extortionate extensions of credit, carjacking, gang related shootings, interstate theft, and narcotics trafficking.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. The FBI is currently conducting a criminal investigation concerning Antonio JOHNSON, for violations of 18 U.S.C. § 922(o) (Illegal Possession of a Machinegun).

## **II. PROBABLE CAUSE**

4. I reviewed records related to JOHNSON's criminal history and learned the following:

- a. On or about March 13, 2014, JOHNSON was arrested and charged with one count of carrying a concealed weapon. On or about April 7, 2014, JOHNSON pleaded guilty to a reduced count of felony carrying a concealed weapon – attempt in the Third Judicial Circuit Court, Wayne County, Michigan. In June 2014, JOHNSON was sentenced to two years of probation;
- b. While on probation, on or about February 5, 2015, JOHNSON was arrested and charged with one count of felon in possession of a firearm and one count of felony firearm. On or about April 17, 2015, JOHNSON pleaded guilty to one count of felon in possession of a firearm in the Third Judicial Circuit Court, Wayne County, Michigan. In May 2015, JOHNSON was sentenced to one to five years' incarceration;

- c. While on parole, on or about August 6, 2016, JOHNSON was arrested and charged with one count of fleeing and eluding in the third degree, one count of receiving and concealing stolen property (motor vehicle), and one count of resisting and obstructing police. On or about September 16, 2016, JOHNSON pleaded guilty to one count of fleeing and eluding in the third degree in the Third Judicial Circuit Court, Wayne County, Michigan. In October 2016, JOHNSON was sentenced to six months to five years' incarceration;
- d. While on parole, on or about November 9, 2017, JOHNSON was arrested and charged with one count of felonious assault, one count of felony firearm, one count of felon in possession of a firearm, one count of possession of a loaded firearm in a vehicle, and one count of fleeing and eluding in the third degree. On or about February 22, 2018, JOHNSON pleaded guilty to one count of felonious assault, one count of felony firearm, and one count of fleeing and eluding in the third degree in the Third Judicial Circuit Court, Wayne County, Michigan. In March 2018, JOHNSON was sentenced to two years' incarceration.

5. Based on my training and experience, defendants are warned of the maximum penalty when they enter a plea of guilty to a felony. Additionally,

defendants are advised that they are pleading guilty to a felony. Due to the number of JOHNSON's felony convictions, the amount of time he has been incarcerated as a result of those convictions, and the fact that he has previously been convicted of the offense felon in possession of a firearm, there is probable cause to believe that JOHNSON is aware of his status as a convicted felon.

6. On July 24, 2024, at approximately 8:21 p.m., Detroit Police Department (DPD) officers were on routine patrol in the area of Puritan and Hartwell Street in Detroit. Officers saw a group of individuals standing outside of a rental hall on Puritan Street and pulled into the parking lot. One of those people—later identified as JOHNSON—was wearing a black ski mask, black hoodie and black shorts, and was carrying what looked like a firearm with an extended magazine in his shorts' pocket.

7. Before the officers fully stopped the scout car, JOHNSON quickly walked inside the building. Officers stopped the car and followed JOHNSON inside. One officer saw Johnson walk into a room in the hall and throw the gun on the ground. The officers quickly caught up to JOHNSON and placed him under arrest. JOHNSON pulled his arms away from the officers and resisted being handcuffed.

8. Officer's recovered JOHNSON's firearm from the ground, a few feet from where JOHNSON was standing. The firearm—comprised of a polymer 80 lower receiver and Glock 20 slide—was equipped with a machinegun conversion

device (MCD), which is commonly referred to as a “switch”. The MCD or “switch” is a conversion device that is designed to convert a semi-automatic firearm to a fully automatic firearm, which is capable of expelling multiple rounds from a single trigger pull. Since the sole purpose of a MCD or “switch” is to make a firearm fully automatic, the MCD or “switch” itself is classified as a machinegun under federal law.

9. ATF Special Agent Kenton Weston viewed photographs of the firearm comprised of a polymer 80 lower receiver and Glock 20 slide recovered in this case. In addition to basic ATF training, SA Weston is a graduate of a specialized course on privately made firearms and machinegun conversion devices (PMF/MCD). SA Weston has provided instruction to DPD officers on the identification of PMFs and MCDs. SA Weston has experience in the investigation, seizure, and examination of dozens of PMFs and MCDs. After viewing the photos, SA Weston confirmed that the device affixed to the firearm appeared to have design features consistent with a machinegun conversion device (MCD), colloquially referred to as a “Glock Switch.”

10. The large crowd inside the rental hall became hostile towards the officers. The crowd screamed at the officers and blocked the door to the room, preventing the officers from leaving. Officers called for back-up. When back-up arrived, the officers took JOHNSON out of the building. As the officers walked him out, JOHNSON attempted to pull away from the officers. At the scout car,

JOHNSON initially refused to get into the car.

### III. CONCLUSION

11. Probable cause exists to believe that on July 24, 2024, Antonio JOHNSON knowingly possessed a firearm equipped with a machinegun conversion device in violation of Title 18 U.S.C. Section 922(o). This violation occurred within the Eastern District of Michigan.



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Jeffrey Jacobs, Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
And/or by reliable electronic means



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Honorable Anthony P. Patti  
United States Magistrate Judge

Dated: July 26, 2024